R-E-M-A-R-K-S

Claims 1-20 remain pending in the present application. Claims 1-3, 15-18 and 20 stand previously withdrawn from consideration.

Rejection of claims 4-6 and 19 under 35USC 103(a) over Schrenk et al. (U.S. 4,091,550) and Kalley (U.S. 7,129,706)

In response, the Applicant amends claims 4 and 19. The subject matter of the present amendment is supported by the original description and is described in at least paragraphs [0026], [0035], [0037] and [0048].

Concerning claim 4, the Applicant submits that the prior art does not teach "a host computer comprising means for communicating with a simulation server, and means for associating each unique identifier code with a corresponding probe event, means for determining a probe point event from a unique identifier code transmitted through at least one probe upon an electrical contact between the at least one probe and one of said probe points, the probe point event being indicative of one of a commencement and a termination of the electrical contact, passing the probe point event to the simulation server, and determining a response of the simulation server to the probe point event" as claimed.

In Schrenk et al., there is disclosed "VOM probe 171 has a low voltage (+10 volts) on tip 172 which completes a circuit when it touches a test point. By monitoring all test points, the computer "knows" which point is touched." (col. 6: 35-38) "When this tip touches a receiver test point, it raises the voltage of the test line connected between link 190 and the touched test point. About 10 times per second, computer 180 monitors these lines and notes if a test point line is true (maintained at 10 volts) or false (maintained at 0 volts). If all test lines are maintained at zero volts, the probe is not touching a test point. If a line is true, the computer notes the test point touched and accesses a corresponding value from a pre-stored data table (either table V or R)." (col. 9:16 to col. 10:8)

According to the above teachings in Schrenk et al., the probe is not monitored for events, the test points are. Hence, an event in which the probe contacts a test point is not determined from **a unique identifier code transmitted through** at least one probe upon contact with the

probe. To this matter, the Applicant points out that Schrenk et al. does not teach **an information flow** from or into a probe upon contact of test points, as submitted in the Advisory Action sent November 13, 2007. Schrenk et al. teaches "completing a circuit" by **applying "a low voltage** (+10 volts) on tip 172" with the probe, on a test point (emphasis added, and referring to the above citation—col. 6: 35-38). A low voltage which is merely for completing a circuit is not an information flow, and hence, does not at all suggest a unique identifier code.

In addition, from the above-cited passage of Schrenk et al., this prior art teaches monitoring for a true or a false state of a test point (i.e. the probe **is or is not in contact** with the test point). Schrenk et al. does not teach the determination of a probe point event such that a **commencement and a termination of an electrical contact** between the probe and the test point is taken into consideration.

Concerning Kally, the Applicant submits that Kalley is not directed nor related to a computer-aided instructional system. Kalley teaches a tester reading identification information inputted into the tester in a variety of ways and for the purpose of identifying a part prior to testing. A skilled person in the art would therefore not be inclined to combine Kalley's teachings with those of Schrenk et al.

In addition, Schrenk et al.'s teachings would have to be substantially changed in order to be combined with the teachings of Kalley. Schrenk et al. monitor circuits completed at the test points whereas Kalley reads a signal coming from test points. The entire functionalities and the technology of Schrenk et al.'s system would have to be totally altered in order to arrive at the claimed subject matter.

In Kalley's method, "attaching the battery tester to the battery (...) can optionally include attaching an amps probe to a negative battery electrode". A negative battery electrode does not relate to a probe point on a mechanical mock-up as claimed.

Furthermore, according to Kalley's "second option" whereby "if the battery contains an imbedded chip that sent off a signal with the code and this signal were inputted into the tester, for example, contemporaneously with the test, this can limit the options for fraudulent input" (col. 6: 43-48), Kalley does not teach that this signal is sent off into and through the probe upon

contact with the probe and in such a way to indicate one of a commencement and a termination of the electrical contact as in the claimed subject matter.

For the above reasons, the Applicant submits that claim 4 overcomes the prior art.

Claim 19 recites similar limitations as claim 4. The above reasons are therefore also form the basis for allowing claim 19 over the prior art.

In view of the foregoing, dependent claims 5-6 are therefore also allowable. Reconsideration of the above rejections is kindly requested.

Rejections of claims 7 and 8-14 under 35USC 103(a) over Schrenk et al., Kalley and further in view of Krauss et al.(U.S. 2002/0191363) and Fordham et al. (U.S. 5,067,901)

In view of the foregoing, the above rejections are moot. Reconsideration of the claimed subject matter is therefore kindly requested.

In view of the foregoing, it is believed that claims 1 to 11 are allowable and a Notice of Allowance is earnestly solicited.

Respectfully submitted,

ISON et al.

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